

PUBLIC UTILITIES COMMISSION

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August 2, 2016

Mr. Mark Williams, Operations Manager
West Coast Gas Company Inc.
9203 Beatty Drive
Sacramento, CA 95826

GI-2016-04-WCG34-02B

SUBJECT: General Order 112¹ Gas Inspection of West Coast Gas Company

Dear Mr. Williams:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted Regulator Station and Valve inspections of West Coast Gas Company (WCG) on April 11-14, 2016 and May 12-13, 2016.

The audit consisted of a review of welding, plastic fusion, pressure testing, regulator station, and valve inspection procedures described in WCG's Operation and Maintenance (O&M) Plan. SED staff also reviewed records of maintenance activities for the years 2013-2015 and conducted field inspection of WCG's three service areas: Mather Housing & Industrial located in Rancho Cordova, Castle system located in Atwater, and Herlong system located in Herlong. Additionally, SED staff reviewed WCG employees' operator qualification records and observed WCG personnel performing relevant covered tasks.

SED's findings are noted in the Summary of Inspection Findings (Summary) which contains probable violations and areas of concerns, recommendations, and observations. During the audit, WCG made changes to its O&M Plan and took corrective actions to incorporate some of the procedural and record keeping related deficiencies that SED identified.

Within 30 days of your receipt of this letter, please provide a written response indicating the corrective actions and preventive measures taken by WCG to address the violations and observations noted in the Summary. Pursuant to Commission Resolution ALJ-274, SED staff has the authority to issue citations for each violation found during the inspection.

If you have any questions, please contact Banu Acimis at (916) 928-3826 or by email at banu.acimis@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads 'Kenneth A. Bruno'.

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

cc: Ray Czahar, WCG

¹ General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 15-06-044.

SUMMARY OF INSPECTION FINDINGS

I. Probable Violations

1. Title 49, Code of Federal Regulations (CFR), §192.285 Plastic pipe: Qualifying persons to make joints

(a) No person may make a plastic pipe joint unless that person has been qualified under the applicable joining procedure by:

- (1) Appropriate training or experience in the use of the procedure; and*
- (2) Making a specimen joint from pipe sections joined according to the procedure that passes the inspection and test set forth in paragraph (b) of this section.*

(b) The specimen joint must be:

- (1) Visually examined during and after assembly or joining and found to have the same appearance as a joint or photographs of a joint that is acceptable under the procedure; and*
- (2) In the case of a heat fusion, solvent cement, or adhesive joint:*
 - (i) Tested under any one of the test methods listed under §192.283(a) applicable to the type of joint and material being tested;*
 - (ii) Examined by ultrasonic inspection and found not to contain flaws that would cause failure; or*
 - (iii) Cut into at least 3 longitudinal straps, each of which is:*
 - (A) Visually examined and found not to contain voids or discontinuities on the cut surfaces of the joint area; and*
 - (B) Deformed by bending, torque, or impact, and if failure occurs, it must not initiate in the joint area.*

(c) A person must be re-qualified under an applicable procedure once each calendar year at intervals not exceeding 15 months, or after any production joint is found unacceptable by testing under §192.513.

(d) Each operator shall establish a method to determine that each person making joints in plastic pipelines in the operator's system is qualified in accordance with this section.

SED reviewed WCG's Plastic Fusion Procedures and noted that qualification requirements in Sections 5.1, 5.2, 5.5, 5.6, 5.8, and 5.9 in its Operator Qualification (OQ) Plan, dated 4/14/16, does not specify the reevaluation interval for the plastic fusion types butt, socket, and electrofusion that WCG currently uses in its system.

WCG must re-qualify its personnel under an applicable procedure once each calendar year at intervals not exceeding 15 months, or after any production joint is found unacceptable by testing under §192.513 to comply with §192.285 (c).

WCG must also add the annual requalification requirement into its O&M & OQ Plans.

Please provide SED with the revised versions of the plans to address this finding.

2. Title 49, CFR, §192.513 Test requirements for plastic pipelines.

(a) Each segment of a plastic pipeline must be tested in accordance with this section.

(b) The test procedure must insure discovery of all potentially hazardous leaks in the segment being tested.

(c) The test pressure must be at least 150 percent of the maximum operating pressure or 50 p.s.i. (345 kPa) gage, whichever is greater. However, the maximum test pressure may not be more than three times

the pressure determined under §192.121, at a temperature not less than the pipe temperature during the test.

(d) During the test, the temperature of thermoplastic material may not be more than 100(F (38(C), or the temperature at which the material's long-term hydrostatic strength has been determined under the listed specification a specification, whichever is greater.

SED reviewed WCG's Procedures for Facility Leak Test / Pressure Test and Pre-Testing Requirements and noted the following:

2.1 Pressure/leak test activity is not considered a covered task; however, it is a covered task as per §192.801(b); the 4-part test. WCG made this change in its O&M Plan and will only allow qualified personnel to perform this covered task.

2.2 SED staff observed some pretested pipe in the shop which was labeled as pretested at 80 psi for 10 minutes. SED noted that since the Wherry Section of the Mather Housing area has an MAOP of 60 psi, WCG must test the pipe segments to 90 psi. Additionally, WCG's procedures require pretest for not less than an hour.

WCG must retest all its pipe segments to comply with its pretest requirement in its O&M Plan and §192.513 requirements.

2.3 WCG currently is not recording the temperature of the pipe during pressure test.

WCG revised its procedures to have provisions to take and records temperature of the pipe.

Please provide SED with an updated version of Pressure Test/Pretest Procedures to address all deficiencies identified under Items # 6.1- 6.4.

3. Title 49, CFR, §192.517 Records.

(a) Each operator shall make, and retain for the useful life of the pipeline, a record of each test performed under §§192.505 and 192.507. The record must contain at least the following information:

- (1) The operator's name, the name of the operator's employee responsible for making the test, and the name of any test company used.*
- (2) Test medium used.*
- (3) Test pressure.*
- (4) Test duration.*
- (5) Pressure recording charts, or other record of pressure readings.*
- (6) Elevation variations, whenever significant for the particular test.*
- (7) Leaks and failures noted and their disposition.*

(b) Each operator must maintain a record of each test required by §§192.509, 192.511, and 192.513 for at least 5 years.

3.1 WCG Operations Manager explained that when WCG purchased the pipeline system from Mather Field Utilities- Air Force in 1996 (about 20 years ago), WCG did not inherit any pressure records. SED also noted that the previous operator installed the pipeline in 1946, approximately 70 years ago, when there was no requirement for pressure testing pipelines.

Ray Czahar of WCG stated the following regarding the Operating Pressure and Maximum Operating Pressure at Mather Industrial Area:

“The USAF abandoned operations and evacuated all military personnel from Mather Air Force Base in 1993. The base was leased to Sacramento County who, at that time, was primarily interested in developing a commercial airport venue to complement Sacramento International Airport. Under the terms of the Base Realignment And Closure (BRAC), the USAF would be responsible for conveying the utility systems (electric, natural gas, water and sewer and telephone) to private service providers. In the meantime, the Mather Field BRAC hired contractors to maintain the systems. In 1996, Mather Field Utilities (predecessor to West Coast Gas Company), was awarded the natural gas system by the USAF, subject to receiving a CPCN (Certificate of Public Convenience and Necessity) from the CPUC. In April 1998, WCG (formally MFU), was awarded a CPCN by the CPUC.

When WCG took control of the natural gas system from the contractors hired by the BRAC in 1996 there was no documentation on the MAOP. The USAF installed and maintained the natural gas distribution system in the industrial area of Mather under its own operating and maintenance rules and not 192 CFR 49. PG&E built and operated the gas distribution system at the Wherry Housing area although the USAF owned that system and had paid PG&E for the cost of installing the gas system. To my knowledge, WCG was never provided with any documentation on the MAOP from the USAF. WCG knew that the Operating Pressure in the industrial area was set a 7 psig and WCG has kept the Operating Pressure at that level since it took control of the system in 1996.”

3.2 SED reviewed WCG’s records and noted that WCG labels the pretested pipe with test pressure, duration, and date once pressure test is completed in the shop; however, WCG does not keep any pressure records for the following operation and maintenance activities:

1. Post pressure test of the new pipe installations in the field;
2. Pressure test of pipe repairs in the field;
3. Use of pretested pipe in the field.

SED determined that WCG must record test medium, pressure, duration, pipe temperature, leaks and failures discovered as a result of pressure testing and other details required by §§ 192.503 Test requirement for plastic pipelines & 192.517 Records for pressure tests conducted in the field as well as any pretesting done prior to installations in the shop.

SED noted that WCG generated a form, Form 503, to capture all the data required for pre & post pressure tests conducted along with pipe information that is used in WCG’s pipeline system.

4. Title 49, CFR §192.619 Maximum allowable operating pressure: Steel or plastic pipelines

(a) No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure determined under paragraph (c) or (d) of this section, or the lowest of the following:...

(2) The pressure obtained by dividing the pressure to which the segment was tested after construction as follows:

(i) For plastic pipe in all locations, the test pressure is divided by a factor of 1.5.../

(3) *The highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column. This pressure restriction applies unless the segment was tested according to the requirements in paragraph (a)(2) of this section after the applicable date in the third column or the segment was uprated according to the requirements in subpart K of this part:*

Pipeline segment	Pressure date	Test date
—Onshore gathering line that first became subject to this part (other than §192.612) after April 13, 2006	March 15, 2006, or date line becomes subject to this part, whichever is later	5 years preceding applicable date in second column.
—Onshore transmission line that was a gathering line not subject to this part before March 15, 2006		
Offshore gathering lines	July 1, 1976	July 1, 1971
All other pipelines	July 1, 1970	July 1, 1965

(4) *The pressure determined by the operator to be the maximum safe pressure after considering the history of the segment, particularly known corrosion and the actual operating pressure.*

(b) *No person may operate a segment to which paragraph (a)(4) of this section is applicable, unless over-pressure protective devices are installed on the segment in a manner that will prevent the maximum allowable operating pressure from being exceeded, in accordance with §192.195.*

(c) *The requirements on pressure restrictions in this section do not apply in the following instance. An operator may operate a segment of pipeline found to be in satisfactory condition, considering its operating and maintenance history, at the highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column of the table in paragraph (a)(3) of this section. An operator must still comply with §192.611.*

(d) *The operator of a pipeline segment of steel pipeline meeting the conditions prescribed in §192.620(b) may elect to operate the segment at a maximum allowable operating pressure determined under §192.620(a).*

SED requested MAOP validation records for WCG's systems and put together the attached spreadsheet. As can be seen from the spreadsheet, WCG failed to provide the following MAOP documentation to verify the establishment of the MAOP of its systems.

Please see the attached spreadsheet for information regarding deficiencies identified in WCG's establishment and documentation of MAOP in WCG's systems. Please also see the red highlighted text that shows the areas where deficiencies identified and WCG's responses are necessary.

4.1 Wherry section of Mather Distribution Pipeline System:

WCG did not provide any MAOP documentation or explanation how MAOP was established for this section of its existing steel pipeline which was acquired from the previous operator.

According to WCG's O&M (4/13/16), the MAOP of this system is 60 psig; however, WCG's uprate document contradicts this statement. Page 1 of "West Coast Gas Uprate Plan for Capehart at Mather, November 2002" states the MAOP as 50 psig.

Please provide SED with documentation to demonstrate how WCG established the MAOP of Wherry Section of Mather Distribution Steel Pipeline system, explain how it was determined, and the current MAOP of the system.

4.2 Capehart Section of Mather Distribution Steel Pipeline System:

On June 1, 2016, SED requested records from WCG showing that the steel pipe in the Capehart system was equivalent to ASTM A53 steel, as claimed in the uprating documents provided by WCG on May 31, 2016. On June 15, 2016, WCG responded, "Coupons were sent to ETMS for testing, WCG will forward test results as soon as we receive them." To date, SED has not received those records.

According to WCG's O&M (4/13/16), the MAOP of this system is 17 psig; however, WCG's uprate document contradicts this statement. Page 1 in "West Coast Gas Uprate Plan for Capehart at Mather, November 2002" states the MAOP as 15 psig.

Please provide SED with documentation to demonstrate how WCG established the MAOP of Capehart Section of Mather Distribution Steel Pipeline system, explain how it was determined, and the current MAOP of the system.

4.3 Capehart Section of Mather Distribution Plastic Pipeline System:

On June 1, 2016, SED requested any pressure test reports of the PE services at the Capehart system installed during and after any new housing construction in 1998. On June 15, 2016, WCG provided three different pressure charts showing 100 psi pressure tests for no less than 14 minutes for three different sections of pipe. These sections were labeled "McRoberts," "Woodring," and "Biddetford/Brattleboro," which are all street names within the housing area.

According to WCG's O&M (4/13/16), the MAOP of this system is 17 psig; however, WCG's uprate document contradicts this statement. Page 1 in "West Coast Gas Uprate Plan for Capehart at Mather, November 2002" states the MAOP as 15 psig.

Please provide SED with the current MAOP of the system.

4.4 Castle New Plastic Distribution Pipeline System:

On June 1, 2016, SED requested the pressure test report, including the pressure chart, of the P.E. main at Castle installed in 1999. On June 15, 2016, WCG responded, "The 4 inch line was installed by WCG in 1999 and was pressure tested by compressed air to 100 psi for a period of 24 hours," and provided a pressure chart. The chart provided however, is designed to be used as an hour long test, delineated by 5 minute intervals. Also, the redline is at the 150 psi level, not 100 psi. The notes on the back of the chart are inconsistent with the data on the front: "24 HR Test at 100 PSI".

Please provide SED with explanation how long the pressure test was conducted and the current MAOP of the system.

5. Title 49, CFR §192.739 Pressure limiting and regulating stations: Inspection and testing.

(a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is—

(1) In good mechanical condition;

(2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;

(3) Except as provided in paragraph (b) of this section, set to control or relieve at the correct pressure consistent with the pressure limits of §192.201(a); and

(4) Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.

During the field inspection in Herlong, SED staff noted the following:

5.1 In addition to the regulator and monitor on both main and by-pass line, there are two other Fisher regulators that cut the high inlet pressure of 850 psig to 150 psig. WCG personnel explained that they perform maintenance of these regulators; however, SED did not find any maintenance records.

WCG must conduct annual maintenance of the upstream Fisher regulators and keep the records. WCG must also update its forms and procedures accordingly.

5.2 Additionally, WCG must also update its O&M Plan by adding the procedures of performing internal inspections of worker and monitor regulators on both main line and by-pass lines.

5.3 SED also noted that WCG did not have any schematic diagram of its regulator station located at Herlong.

WCG must have a schematic diagram of its regulator station to show details of its system such as worker and monitor regulators on both main line and by-pass line and any other equipment which is essential for the integrity of the system.

6. Title 49, CFR, §192.747 Valve maintenance: Distribution systems.

(a) Each valve must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year.

SED reviewed WCG's valve maintenance records and noted that WCG failed to check and service the following key valves within the allowed 15-month interval at Castle and Mather systems shown in Tables 1 & 2.

Table 1- List of Castle Valves and Maintenance Dates

Valve #	Maintenance dates	Maintenance dates
Key Valve 2	4/24/2013	9/11/2014
Key Valve 3	4/04/2013	9/11/2014
Key Valve 4	4/24/2013	9/11/2014
Key Valve 5	4/24/2013	9/11/2014
Key Valve 6	4/24/2013	9/11/2014

Table 2- List of Mather Valves and Maintenance Dates

Valve #	Maintenance dates	Maintenance dates
Key Valve 3	2/24/2014	6/7/2015
Key Valve 4	2/24/2014	6/7/2015
Key Valve 5	2/24/2014	6/7/2015
Key Valve 6	2/24/2014	6/7/2015
Key Valve 7	2/24/2014	6/17/2015
Key Valve 8	2/24/2014	6/17/2015
Key Valve 13	2/24/2014	6/22/2015

Please provide SED with preventive measures that WCG has taken to address this deficiency.

7. Title 49, CFR, §192.747 Valve maintenance: Distribution systems.

(b) Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve.

SED found that WCG's Valve Inspection and Maintenance Procedures did not address how to designate an alternative valve for alternate means of control if any of WCG's key valves is found inoperable until corrective actions are taken. Furthermore, WCG procedures did not describe the type and timeframe of possible remedial actions that can be taken to repair or replace any inoperable key valve for safe operation of its system.

SED noted that WCG has made some changes during the audit to address these deficiencies in its O&M Plan.

Gas Piping Technology Committee has the following guide material related to inoperable valves:

"The following actions should be considered if a valve is found inoperable.

(a) Repair the valve to make it operable.

(b) Designate another valve or valves to substitute for the inoperable valve that will provide a similar level of effectiveness for isolating the desired area. Consideration should be given to the following.

(1) Updating records for emergency shutdown and future maintenance requirements.

(2) Informing employees of the change to the isolation or emergency shutdown plan.

(c) Replace the valve."

Please provide SED with the updated version of Valve Inspection and Maintenance Procedures that address deficiencies identified above.

8. WCG's O&M Plan requires flushing and greasing steel valves during inspection and maintenance; however, SED noted that WCG did not flush or grease some valves, such as Key Valve 21 & Secondary Valve 20, during the maintenance conducted on April 8-9, 2015 in WCG's Mather-Commercial pipeline system.

Please inform SED with the corrective and preventive actions taken to address this issue.

9. WCG gas leak records showed that there were a total of three Grade 3 underground leaks still outstanding at WCG's Castle system, shown in Table 3.

Table 3- List of Open Grade 3 Leaks in Castle

Leak location	Discovery date	Repair or recheck date
Valve 24, Airlight Dr.	9/15/2015	9/28/2015
Valve 59, 150' South of C Street	9/15/2015	-
Building 439 on Carried Dr.	9/15/2015	-

On 4/12/2016, SED and WCG personnel visited the Grade 3 leak located at Valve 24 and noted that even though it was repaired on 9/28/2015, it was still leaking. Similarly, SED observed that Grade 3 leak located nearby Valve 59 was still pending repairs.

Please provide SED with a status update on these leaks along with repair or leak recheck records.

10. SED also noted that there were a total of two Grade 3 underground leaks pending repairs from 2015 in WCG's Mather system. Table 4 shows details of the leaks.

Table 4- List of Open Grade 3 Leaks in Mather

Leak location	Discovery date	Repair or recheck date
Service line to 10817 Woodring Drive	10/29/2015	-
Main line leak at 4412 Kingscote Way	10/29/2015	-

Please provide SED with a status update on these leaks along with repair or leak monitor records.

II. Areas of Concern/ Observations/ Recommendations

1. Title 49, CFR, §192.59 Plastic Pipe

§192.59(a) states in part:

- (a) New plastic pipe is qualified for use under this part if:*
(1) It is manufactured in accordance with a listed specification; and
(2) It is resistant to chemicals with which contact may be anticipated.

SED staff visited WCG's shop where WCG stores and conducts pretests of the PE pipes and noted the following:

SED staff observed some pipe segments with illegible print line. SED asked WCG to become more knowledgeable about the print line requirements and learn how to read the essential information that is required to be on the pipe.

GPTC guide material for this code section states the following:

Each operator should establish that new or used pipe complies with the requirements of ASTM D2513 (see §192.7 for IBR) for thermoplastic or ASTM D2517 (see §192.7 for IBR) for thermosetting plastics by one of the following methods.

- (a) Inspection and testing by an accredited laboratory with written certification.

(b) Inspection and testing by the user.

(c) Written certification from the manufacturer at the time of purchase. Included as part of this certification.

ASTM D2513- 04 Marking requirements states in part:

“7. Marking

7.1 Pipe—All required marking shall be legible, visible, and permanent. To ensure permanence, marking shall be applied so it can only be removed by physically removing part of the pipe wall. The marking shall (1) not reduce the wall thickness to less than the minimum value for the pipe, (2) not have any effect on the long-term strength of the pipe, and (3) not provide leakage channels when elastomeric gasket compression fittings are used to make the joints. These marking shall consist of the word GAS, the designation ASTM D 2513, the manufacturer's name or trademark, the normal pipe size including the sizing system used (IPS, CTS, or OD), DR or minimum wall thickness, material designation, and date of manufacture.

7.1.1 In addition to 7.1, the pipe marking shall include a coding that will enable the manufacturer to determine the location of manufacture, pipe production and resin lots, and any additional information which is agreed upon between the manufacturer and purchaser. The manufacturer shall maintain such records for fifty years or for the design service life of the pipe, whichever is longer.

7.1.2 All the markings in 7.1 and 7.1.1 shall be repeated at intervals not exceeding 5 ft (1.5 m). For indented printing, either the indented print line shall be in a color that contrasts with that of the pipe, or a separate print line shall be in a color that contrasts with the pipe. See Annex A1 and Annex A2 for additional specific marking requirements. When color is applied to identify gas service, such as with color stripes, a color shell or solid color pipe, yellow color shall be used.

NOTE 10—Using color to identify piping service is not mandatory, but if used, yellow color is required.

NOTE 11—The non-mandatory, preferred order for all the items required in the print line in the marking sections 7.1 and 7.2 are:

- (1) Pipe size including sizing system (IPS, CTS or OD),*
- (2) SDR (DR) or minimum wall thickness,*
- (3) Manufacturer's name or trademark,*
- (4) GAS,*
- (5) Pipe material designation code,*
- (6) Elevated temperature code from Table 4,*
- (7) ASTM D 2513,*
- (8) Manufacturer's lot code (includes date of manufacture in some cases), and*
- (9) Additional information, including date of manufacture, coil number, sequential footage, third party certification mark etc.*

Example:

*2 in. IPS SDR 11 MANUFACTURER NAME GAS PE 2406 CEC ASTM D 2513 LOT CODE INFO
02JAN98 coil #506...”*

Abbreviations:

OD: Outside diameter, WT: Wall thickness, SDR: Standard Dimension Ratio is the ratio of the OD of pipe to the wall thickness,
IPS: Iron Pipe Size, CTS: Copper Tubing Size.

After SED discussed the importance and requirements of print line on the pipe, WCG contacted the distributor company of Driscoplex pipe and obtained more information how to read Driscoplex/Performance pipe gas print line. Additionally, WCG added this information to its O&M Plan.

SED also suggested that WCG should only accept any pipe whose print line is clear and legible to be able to confirm that the pipe is manufactured in accordance with a listed specification and resistant to chemicals which complies with §192.59 and ASTM D2513 requirements and manufacturing date is visible.

Please provide SED with an updated version of the affected procedure in WCG's O&M Plan.

2. SED staff also noted that WCG stores its PE pipes in the shop where sunlight comes from the sunroof windows which may or may not affect the integrity of the stored pipes.

WCG contacted its pipe distributor and found out that the manufacturers recommendation is to keep PE pipe outdoor up to 3 years. SED observed some PE pipes with manufacturing dates of 2012 in the shop.

WCG should specify the maximum outdoor storage limit of 3 years in its O&M Plan and also ensure that the pipe that is stored in the shop is not exposed to sunlight.

GPTC guide material for this topic is as follows:

2. WEATHERING STATEMENT FOR PLASTIC PIPE

(a) The resistance of plastic pipe to outdoor exposure can vary greatly. The manufacturer of the plastic pipe should be required to supply a written statement of the period of time the product can be stored outside without loss of properties that qualify it for buried gas piping application. The operator should ensure that this exposure time is not exceeded.

(b) When storing outdoors, cumulative exposure periods should be considered. The Pipe Production Code marked on the pipe includes the date of manufacture. In general, most manufacturers store pipe outdoors prior to shipment, and allowance for this period should be made. Exposure time can be minimized by issuing from storage on a "first-in, first-out" rotation, with the date of manufacture used as a control. The pipe with the earliest date of manufacture should be issued first for installation.

(c) See §192.321(g) and guide material under §192.321 for limitations and considerations on the use of plastic pipe temporarily installed above ground.

Please provide SED with an updated version of the affected procedure in WCG's O&M Plan.

3. During the field inspection, SED staff observed that WCG personnel sometimes fail to use personal protective equipment (PPE) for the covered tasks that they perform. In fact, during a valve inspection, one employee had a minor cut to his hand due to not wearing gloves. We strongly recommend that WCG employees use appropriate PPE to minimize the risk of having injuries while performing covered tasks. PPE may include protective gloves, safety glasses, appropriate footwear, knee pads etc.

Additionally, WCG procedures require all personnel to utilize proper protective clothing and equipment when performing covered tasks. SED recommends that WCG should specify the PPE and implement the PPE requirements in the field for personnel safety.